

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CAROLYN GREENE, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,  
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

x

)

)

)

)

)

)

)

)

)

)

)

)

)

x

Civil Docket for Case No.:  
1:03-CV-12628-NG

Hon. Nancy Gertner

*(Additional captions on following pages)*

DECLARATION OF CHRISTOPHER KELLER IN SUPPORT OF MOTION  
OF THE BHASKAR GROUP FOR CONSOLIDATION OF RELATED ACTIONS,  
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF PROPOSED  
LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL

---

JOHN G. ESPOSITO, On Behalf of Himself and  
All Others Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,  
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

---

MICHAEL E. CRIDEN, Individually and On Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE and  
CARL W. RAUSCH,

Defendants.

---

JOSEPH L. KING, On Behalf of Himself and All Others  
Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,  
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

---

x

)

)

)

)

)

)

)

)

)

)

)

)

)

x

)

)

)

)

)

)

)

)

)

)

)

)

)

x

)

)

)

)

)

)

)

)

)

)

)

)

x

Civil Docket for Case No.:  
1:04-CV-10013-NG

Hon. Nancy Gertner

Civil Docket for Case No.:  
1:04-CV-10046-NG

Hon. Nancy Gertner

Civil Docket for Case No.:  
1:04-CV-10038-NG

Hon. Nancy Gertner

---

ISRAEL SHURKIN and SIARON SHURKIN,  
Individually and On Behalf of All Others Similarly  
Situating,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE and  
CARL W. RAUSCH,

Defendants.

x  
)  
)  
) Civil Docket for Case No.:  
) 1:04-CV-10055-NG  
)  
)

) Hon. Nancy Gertner  
)

---

JAMES J. NIZZO, VIRGINIA C. NIZZO and CARLO  
CILBERTI, On Behalf of Themselves and All Others  
Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,  
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

x  
)  
)  
) Civil Docket for Case No.:  
) 1:04-CV-10065-NG  
)  
)

) Hon. Nancy Gertner  
)

---

BARRY BROOKS,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,  
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

x  
)  
)  
) Civil Docket for Case No.:  
) 1:04-CV-10077-NG  
)  
)

) Hon. Nancy Gertner  
)  
)

---

x

---

ANASTASIOS PERLEGIS, Individually and On Behalf of )  
 All Others Similarly Situated, )

Plaintiff, )

v. )

BIOPURE CORPORATION, THOMAS A. MOORE, )  
 CARL W. RAUSCH and RONALD F. RICHARDS, )

Defendants. )

Civil Docket for Case No.:  
 1:04-CV-10078-NG

Hon. Nancy Gertner

---

MARTIN WEBER, On Behalf of Himself and All Others )  
 Similarly Situated, )

Plaintiff, )

v. )

BIOPURE CORPORATION, THOMAS A. MOORE, )  
 CARL W. RAUSCH and RONALD F. RICHARDS, )

Defendants. )

Civil Docket for Case No.:  
 1:04-CV-10090-NG

Hon. Nancy Gertner

---

BRUCE HAIMS, Individually and On Behalf of )  
 All Others Similarly Situated, )

Plaintiff, )

v. )

BIOPURE CORPORATION, THOMAS A. MOORE, )  
 CARL W. RAUSCH and RONALD F. RICHARDS, )

Defendants. )

Civil Docket for Case No.:  
 1:04-CV-10144-NG

Hon. Nancy Gertner

---

x

---

MODEL PARTNERS LIMITED, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,  
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

---

x

)

)

)

)

)

)

)

)

)

)

)

)

)

x

Civil Docket for Case No.:  
1:04-CV-10155-NG

Hon. Nancy Gertner

---

JUNE E. PATENAUDE, Individually and On Behalf of  
All Others Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,  
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

---

x

)

)

)

)

)

)

)

)

)

)

)

)

x

Civil Docket for Case No.:  
1:04-CV-10179-NG

Hon. Nancy Gertner

---

W. KENNETH JOHNSON, On Behalf of Himself and All  
Others Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,  
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

---

NANCY L. PINCKNEY and GERTRUDE PINCKNEY,  
Individually and On Behalf of All Others Similarly  
Situating,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE and  
CARL W. RAUSCH,

Defendants.

---

GREGORY KRUSZKA, On Behalf of Himself and All  
Others Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,  
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

---

x

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

x

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

)

x

)

)

)

)

)

)

)

)

)

)

)

)

)

)

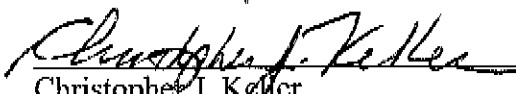
)

x

CHRISTOPHER KELLER hereby declares as follows:

1. I am an associate with the law firm of Goodkind Labaton Rudoff & Sucharow LLP, counsel for the Bhaskar Group ("Movant").
2. I respectfully submit this declaration in support of Movant's motion for consolidation of the related actions, appointment of Movant as Lead Plaintiff and approval of the selection of the firm of Goodkind Labaton Rudoff & Sucharow LLP as Lead Counsel.
3. Annexed hereto as Exhibit A is a true and correct copy of the Certification of Michael Lane, Certification of William Bhaskar, and Certification of Kenneth Isherwood.
4. Annexed hereto as Exhibit B is a true and correct copy of the December 30, 2003 notice announcing the filing of a class action against Biopure Corporation.
5. Annexed hereto as Exhibit C is a true and correct copy of the firm resume of Goodkind Labaton Rudoff & Sucharow LLP.

I declare, under penalty of perjury, this 1st of March, 2004.

  
Christopher J. Keller